November 4, 2011

Ms. Merlange Genece, P.E.
Regional Air Pollution Control Engineer
NYS Department of Environmental Conservation
SUNY @ Stony Brook
50 Circle Road
Stony Brook, NY 11790

Re: 2011 Compliance Test Report
Huntington Resource Recovery Facility

Dear Ms. Genece:

On behalf of Covanta Huntington, Inc., enclosed please find a copy of the final report from the most recent compliance testing performed at the Huntington Resource Recovery Facility. The testing was conducted on our emissions by TESTAR, Inc. from August 31 to September 9, 2011 and on October 1, 2011 in accordance with all applicable test methods and our approved test protocol. As requested in the past, I am also sending a copy of the report to Mr. Randy Orr of the Compliance Monitoring Section in Albany and Mr. Donald Wright of USEPA Region 2.

As described in Section 2.3 of the test report, the initial results from the metals analysis indicated elevated levels of chromium and nickel during Run 2 on Boiler 2 and during Run 1 on Boiler 3. When combined with the other two test runs, the three-run average indicated an exceedance of the permitted mass emission limit for both metals on Boiler 2 and for nickel only on Boiler 3. The samples were re-analyzed to rule out any procedural errors and showed consistent results. We believe that these results are outliers and not representative of typical emissions from the facility. Fortunately, TESTAR was still on Long Island performing emissions testing at another Covanta facility when we received the initial results. We notified the Department's stack test witness of our concern for the accuracy of the results and immediately scheduled a retest for October 1st. The results of the retest were more in line with historical emissions data at the facility, and therefore are presented as the compliance results for Boilers 2 and 3 in the summary tables. The field data sheets and results from the original test runs are included in the appendices of the report for completeness.

As you will note in the report, the dioxin/furan emission level from Boiler 1 was less than 15 ng/dscm @ 7% O_2. Therefore, pursuant to Condition 73 of our Title V Operating Permit, we will again use the alternative performance testing schedule for dioxins/furans specified by 40 CFR 60.58b(g)(5)(iii) when we conduct annual testing in 2012. Testing of PAH's and PCB's will also follow this schedule, per Condition 32.

Based on the steam flow measured during dioxin/furan testing on Boiler 1 in 2011, the 4-hour block CEMS limit increased from 89.1 to 89.5 klb/hr as of November 1, 2011. Per condition 41, the 4-hour baghouse inlet temperature limit will remain at 320°F, which is more stringent than the MACT limit of 30°F greater than the temperature recorded during dioxin/ furan testing. Finally, the minimum 6-hour block carbon injection rate will remain at 10 pounds per hour, which was the usage rate recorded during mercury testing. These limits will be applied to all three boilers and will remain in effect until the next performance test.

If you have any questions, please feel free to contact me at (631) 754-1100, ext. 4295.

Sincerely,

Scott M. Wheeler
Environmental Engineer

cc: D. Ramrakhiani – NYSDEC, Stony Brook (w/o enclosure)
B. Khan – NYSDEC, Stony Brook (w/o enclosure)
R. Orr – NYSDEC, Albany (w/ enclosure)
D. Wright – USEPA (w/ enclosure)

bcc: T. Chambers
K. Stimpfl

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